



**Norwich  
Public Utilities**



BUREAU OF WATER PROTECTION AND LAND REUSE  
OFFICE OF THE BUREAU CHIEF

FEB 04 2010

February 3, 2010

Mr. Paul Stacey  
Bureau of Water Protection & Land Reuse  
State Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Dear Mr. Stacey,

Please accept this correspondence in *opposition* to the Department of Environmental Protection's (DEP) proposed Stream Flow Regulations –PA 05-142. Norwich Department of Public Utilities (NPU) calls for the *rejection* of these regulations as drafted for numerous reasons.

NPU is a municipally owned utility with over a century of first-rate service to the citizens of Norwich, as well as, the surrounding towns of Lebanon, Franklin, Bozrah, Preston, Lisbon, Montville and the Mohegan Tribal Nation. NPU is proud of the longstanding and accomplished relationship that it has held with the State of Connecticut and the DEP over the years. NPU and DEP have worked in partnership on the highly successful fish lift on the Shetucket River that has witnessed a dramatic increase in the American Shad (CT State Fish), brown trout and other aquatic life while continuing to provide clean and green renewable energy at a low cost to our customers. DEP biologists also are now able to observe and monitor the healthiness of the river for environmental impact.

NPU supports the goals of the regulations, but the manner in which the regulations are currently written/drafted are flawed and will have dramatic adverse consequences for NPU's consumers. If NPU were to comply with the regulations as written, it would need to modify dams and infrastructure to the proposed volume of water flow release as required. These modifications will impose unwarranted new costs on the residents of the previously noted towns NPU serves without studying and interpreting data on statewide stream flow impacts.

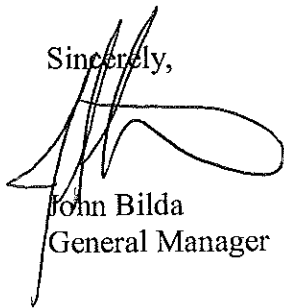
NPU may also be forced to search for new sources of water supply which will most likely increase the rates of our customers. In addition, forced releases of water and limitations on withdrawals could result in insufficient water supplies for Norwich residents and businesses. These limitations will most definitely compromise the public safety of our residents which is a consequence that cannot be ignored.

NORWICH PUBLIC UTILITIES

We request that new stream flow regulations are drafted in a collaborative effort with the State DEP, utility companies, municipalities and all concerned stakeholders. If new regulations are proposed and drafted with a greater scientific approach, much of the harmful results can be avoided.

Thank you for your time and consideration and I look forward to continuing our common interest in the support of a safe and clean environment. If I can be of any assistance please feel free to contact me at 860-823-4192 or by email at [johnbilda@npumail.com](mailto:johnbilda@npumail.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'John Bilda', with a large, sweeping flourish extending to the right.

John Bilda  
General Manager